REMARKS

Applicants respectfully request further examination and reconsideration in view of the above amendments. Claims 1-4, 7-13, 15, 16 and 18-23 remain pending in the case. Claims 1-4, 7-13, 15, 16 and 18-23 are rejected.

35 U.S.C. § 103(a)

Claims 1-4, 9-13, 15, 16 and 20-23 stand rejected under 35 U.S.C. §103(a) as being unpatentable over United States Patent 5,887,145 by Harari et al., hereinafter referred to as the "Harari" reference. Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 1-4, 9-13, 15, 16 and 20-23 are not anticipated nor rendered obvious by Harari in view of the following rationale.

Applicants respectfully direct the Examiner to independent Claim 1 that recites that an embodiment of the present invention is directed to (emphasis added):

> An intermediary apparatus adapted to be communicatively coupled with an electronic device, said electronic device having an externally disposed accessible slot, said intermediary apparatus comprising:
>
> a first module having an opening, said first module adapted to be communicatively coupled with said electronic device, said first module adapted to receive a second module, said first module comprising a wireless communication device;
>
> a controller coupled with said first module, said controller for controlling communication between said first module and said second module, provided said second module is inserted into

said first module, said second module comprising a compact memory device;

a first electrical connector coupled with said first module, said first electrical connector adapted to enable communication between said first module and said electronic device; and

a second electrical connector coupled with said first module, said second electrical connector adapted to enable communication between said first module and said second module, provided said second module is inserted into said first module.

Independent Claims 10 and 21 recite similar limitations. Claims 2-4 and 9 that depend from independent Claim 1, Claims 11-13, 15, 16 and 20 that depend from independent Claim 10, and Claims 22 and 23 that depend from independent Claim 21 provide further recitations of the features of the present invention.

Harari and the claimed invention are very different. Harari teaches a removable mother/daughter peripheral card for use in a personal computer. Applicants understand Harari to teach a peripheral card where the mother card contains common functional components of a number of peripherals, and the daughter card contains the rest of the functional components. (col. 4, lines 22-26). Specifically, the mother/daughter peripheral card operates to place the control operations for a peripheral device on the mother card, while placing functional components specific to a particular application on the daughter card. Applicants understand that the mother card of Harari does not provide any independent functionality, and requires the additional functional components of a daughter block to operate as a peripheral component of the host device. In

particular, Harari does not teach, describe or suggest that the mother card includes a wireless communication device that operates independent of a daughter card.

With reference to Figure 3 of Harari, and the accompanying description, the functional components of the mother card 10 are shown. Controller 40 includes host interface 54 for interfacing with a host system and memory interface 56 for interfacing with a flash memory. Specifically, the host interface communicates with the host system in accordance with the PCMCIA standard or any other standard card interface (col. 7, lines 52-57). Applicants respectfully assert that mother card 10 does not provide any independent functionality, and requires a connection to daughter card 20 to provide such functionality. For example, while mother card 10 includes ROM 52, it is a small amount that is not suitable for mass storage. Connecting daughter card 20 with memory chips 30 to mother card 10 provides the mass storage function. Applicants respectfully assert that Harari does not teach, describe or suggest a mother card that provides any independent functionality. Therefore, Applicants respectfully assert that nowhere does Harari teach, describe or suggest a mother card including a wireless communication device, as claimed.

In contrast, embodiments of the claimed invention are directed towards an intermediary apparatus including a first module, "said first module comprising a wireless communication device" (emphasis added). With

reference to Figure 7A of the present application, intermediary apparatus 2001 includes communication device 108B, where communication device 108B is a wireless communication device (page 32, line 24 through page 33, line 2).

Applicants respectfully assert that Harari in particular does not teach, disclose, or suggest an intermediary apparatus including a first module, "said first module comprising a wireless communication device" as claimed. In particular, Harari provides a mother/daughter peripheral card wherein the mother card includes functional components common to a plurality of daughter cards. The hardware of the mother card acts as a comprehensive controller or interface for a predefined set of peripheral devices implemented on daughter cards that may be connected to the host via the mother card (col. 8, lines 26-34). Applicants respectfully assert that Harari does not teach, describe or suggest a mother card operable to provide any independent functionality without requiring a connection to a daughter card having additional functional componentry. In contrast, by teaching that the mother card requires a connection to a daughter card to provide a functional peripheral component to the host device, Harari teaches away from such a configuration.

Furthermore, Harari teaches that a daughter card may be connected to the mother card to provide a communication peripheral to the host device. Applicants understand the daughter card to be physically connected to the mother card to provide such functionality. For instance, Applicants respectfully

assert that the daughter card requires a power source to operate. With reference to Figure 3 of Harari, power converter 58 provides power to daughter card 20. Since the first module and second module are coupled to a second electrical connector adapted to enable communication between the first module and the second module, there is no need for wireless communications functionality between the first module and second module. Accordingly, the combination of Harari and Nelson would provide the redundancy of two wireless communications devices, resulting in extra componentry at an extra cost. By teaching a mother/daughter peripheral card with common functional components on a comprehensive mother card such that each individual peripheral will have less components, thereby reducing cost (col. 4, lines 30-33), Harari teaches away from the combination with Nelson.

Therefore, Applicants respectfully assert that nowhere does Harari teach, disclose or suggest the claimed embodiments of the present invention as recited in independent Claims 1, 10 and 21, and that these claims are thus in a condition for allowance. Therefore, Applicants respectfully submit the Harari also does not teach or suggest the additional claimed features of the present invention as recited in Claims 2-4 and 9 that depend from independent Claim 1, Claims 11-13, 15, 16 and 20 that depend from independent Claim 10, and Claims 22 and 23 that depend from independent Claim 21. Therefore, Applicants respectfully submit that Claims 2-4, 9, 11-13, 15, 16, 20, 22 and 23

overcome the rejection under 35 U.S.C. § 103(a), and are in a condition for allowance as being dependent on an allowable base claim.

Claims 7, 8, 18 and 19 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Harari in view of United States Patent 6,377,218 by Nelson et al., hereinafter referred to as the "Nelson" reference. Claims 7 and 8 depend from independent Claim 1 and Claims 18 and 19 depend from independent Claim 10. Applicants have reviewed the cited reference and respectfully submit that the embodiments of the present invention as recited in Claims 1 and 10 are not anticipated by the combination of Harari and Nelson in view of the following rationale.

The combination of Harari and Nelson does not teach a docking system as claimed. For instance, Harari and the claimed invention are very different. Applicants understand Harari to teach a mother/daughter peripheral card. However, as described above, Applicants respectfully assert that Harari does not teach, describe or suggest a mother card that provides any functionality to a host device without connection to a daughter card. Therefore, Applicants respectfully assert that Harari does not teach, describe or suggest a mother card including a wireless communication device, as claimed.

Moreover, the combination of Harari and Nelson fails to teach or suggest this claim limitation because Nelson does not overcome the shortcomings of

Harari. Applicants understand Nelson to teach a device for providing an antenna, a receptacle, and a physical connector on a PCMCIA card. In particular, Nelson teaches a PCMCIA card capable of providing wireless communications.

As described in Harari, the mother card does not provide any independent functionality. In particular, the mother card of Harari requires connection to a daughter card to provide a functional peripheral component to the host device. By teaching a mother/daughter peripheral card with common functional components on a comprehensive mother card that does not provide any independent functional peripheral components, Harari teaches away from the combination with Nelson.

Furthermore, Harari teaches that a daughter card may be connected to the mother card to provide a communication peripheral to the host device. Applicants understand Nelson to teach a PCMCIA card that already has wireless communication functionality. As described above, Harari teaches that the daughter card must be physically connected to the mother card to provide a functional peripheral component. Therefore, Applicants respectfully assert that there would be no motivation to combine the references in such a way as to arrive at the claimed invention, as there is only need for a single communication device. Since the first module and second module are coupled to a second electrical connector adapted to enable communication between

the first module and the second module, there is no need for wireless communications functionality between the first module and second module. Accordingly, the combination of Harari and Nelson would provide the redundancy of two wireless communications devices, resulting in extra componentry at an extra cost. By teaching a mother/daughter peripheral card with common functional components on a comprehensive mother card such that each individual peripheral will have less components, thereby reducing cost (col. 4, lines 30-33), Harari teaches away from the combination with Nelson.

Furthermore, Harari teaches that a daughter card may be connected to the mother card to provide a communication peripheral to the host device. Applicants understand the daughter card to be physically connected to the mother card to provide such functionality. For instance, Applicants respectfully assert that the daughter card requires a power source to operate. With reference to Figure 3 of Harari, power converter 58 provides power to daughter card 20. Since the first module and second module are coupled to a second electrical connector adapted to enable communication between the first module and the second module, there is no need for wireless communications functionality between the first module and second module. Accordingly, the combination of Harari and Nelson would provide the redundancy of two wireless communications devices, resulting in extra componentry at an extra cost. By teaching a mother/daughter peripheral card with common functional

components on a comprehensive mother card such that each individual peripheral will have less components, thereby reducing cost (col. 4, lines 30-33), Harari teaches away from the combination with Nelson.

Applicants respectfully assert that nowhere does the combination of Harari and Nelson teach, disclose or suggest the present invention as recited in independent Claims 1 and 10, and that these claims are thus in condition for allowance. Applicants respectfully submit the combination of Harari and Nelson also does not teach or suggest the additional claimed features of the present invention as recited in Claims 7 and 8 dependant on allowable base Claim 1 and Claims 18 and 19 dependant on allowable base Claim 10. Therefore, Applicants respectfully submit that Claims 7, 8, 18 and 19 overcome the rejection under 35 U.S.C. § 103(a), and are in a condition for allowance as being dependent on an allowable base claim.

CONCLUSION

Based on the amendments and arguments presented above, Applicants respectfully assert that Claims 1-4, 7-13, 15, 16 and 18-23 are allowable and, therefore, Applicants respectfully solicit allowance of these Claims.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account No. 23-0085.

Respectfully submitted,

Wagner, Murabito & Hao LLP

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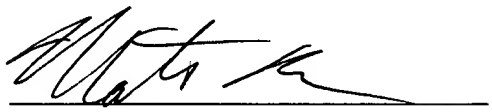

Matthew J. Blecher
Registration No. 46,558

WAGNER, MURABITO & HAO LLP
Two North Market Street
Third Floor
San Jose, CA 95113
(408) 938-9060